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Attorneys for the Fire Victim Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19 -30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBIN J. REILLY IN
SUPPORT OF JOINT *EX PARTE* MOTION
TO FILE REDACTED VERSION OF
REORGANIZED DEBTORS AND FIRE
VICTIM TRUST'S JOINT *EX PARTE*
MOTION TO EXTEND, IN PART,
DEADLINE TO COMPLY WITH ORDER
ON MOTION OF WILLIAM B. ABRAMS
AUTHORIZING DISCOVERY REGARDING
ADMINISTRATION OF THE FIRE VICTIM
TRUST**

[No Hearing Requested]

1 I, Robin J. Reilly, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as Managing Counsel, Corporate and Finance, in the Law Department at
5 Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E Corporation
6 (“**PG&E Corp.**”) and, together with the Utility, the “**Reorganized Debtors**” in the above-captioned
7 chapter 11 cases. I have been employed in this role since May 1, 2021, and prior to such date I was
8 employed as Chief Counsel, Corporate and Finance. I have been employed as an attorney for the Utility
9 since June 2002. In my current role, I am responsible for supervising five attorneys, and advising leaders
10 on corporate governance, securities disclosure and finance issues.

11 2. I am generally knowledgeable and familiar with the July 26, 2022 settlement agreement
12 (the “**D&O Action Settlement**”) entered into between the PG&E Fire Victims Trust, Reorganized
13 Debtors and certain former officers and directors of the Reorganized Debtors. I am authorized to submit
14 this Declaration on behalf of the Reorganized Debtors. The facts set forth in this Declaration are based
15 upon my personal knowledge, my review of relevant documents, and information provided to me by the
16 Reorganized Debtors’ other employees or the Reorganized Debtors’ legal, restructuring, and financial
17 advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

18 3. The D&O Action Settlement, as set forth in the *Reorganized Debtors and Fire Victims*
19 *Trust’s Joint Ex Parte Motion to Extend, In Part, Deadline to Comply with Order on Motion of William*
20 *B. Abrams Authorizing Discovery Regarding Administration of the Fire Victim Trust* (the “**Joint**
21 **Motion**”) and the *Declaration of Robin J. Reilly in Support of Reorganized Debtors and Fire Victim*
22 *Trust’s Joint Ex Parte Motion to Extend, In Part, Deadline to Comply with Order on Motion of William*
23 *B. Abrams Authorizing Discovery Regarding Administration of the Fire Victim Trust* (the “**Reilly**
24 **Declaration**”), contains highly sensitive and confidential commercial information.

25 4. Due to the commercially sensitive nature of certain settlement terms and provisions
26 contained in the D&O Action Settlement, further referenced in the Joint Motion and the Reilly
27 Declaration, the public disclosure of those terms and provisions at this time would commercially and
28 strategically prejudice the Reorganized Debtors. Accordingly, the Reorganized Debtors seek to redact,

1 in part, the Joint Motion and the Reilly Declaration and keep the information redacted therein
2 confidential for a limited period of time as further and more specifically discussed in the Joint Motion.

3 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and
4 correct.

5 Dated: August 29, 2022

6 Respectfully submitted,

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8 By: /s/ Robin J. Reilly
Robin J. Reilly
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